

COPY FOR YOUR  
INFORMATION

Kodak

October 29, 2014

Mr. Alan Steinberg  
Regional Administrator, Region II  
United States Environmental Protection Agency  
290 Broadway Street, 22<sup>nd</sup> Floor  
New York, NY 10278

Mr. John R. Gibb  
New York State Emergency Response Commission  
New York State Emergency Management Office  
1220 Washington Avenue, Building 22, Suite 101  
Albany, NY 12226-2251

Mr. Thomas Marriott, P.E.  
New York State Department of Environmental Conservation  
6274 East Avon-Lima Road  
Avon, NY 14414-9519

Mr. Fred Rion  
Monroe County Office of Emergency Preparedness  
1190 Scottsville Road, Suite 200  
Rochester, NY 14624

Dear Gentlemen:

Subject: Contaminated Groundwater Release on October 22, 2014  
Eastman Kodak Company, Eastman Business Park

NYD 980784 680

On October 23, 2014, notifications were made regarding the above referenced release. Attached is a summary of the events which led to this notification, as well as any additional action which may have occurred after this notification. Eastman Kodak Company, Eastman Business Park Site management, is supplying this information.

If you have further questions regarding this incident, please contact me at (585) 726-7291.

Sincerely,



Burton G. Gorton  
Health, Safety & Environment  
Eastman Kodak Company

Attachment

cc: Mr. Pradeep Jangbari, NYSDEC, Region 8

CONTROL OFFICE  
CORRESPONDENCE  
EPA REGION 2

NOV -3 PM 12:05

22-15-000-1385-A

15th Floor Site Room  
Copy Wilfredo Palaming

# Release Follow-up Reporting Form

Eastman Kodak Company, Eastman Business Park  
1669 Lake Avenue  
Rochester, NY 14650

NRC#: 1099103  
NYSDEC#: 1407611  
Date: 10/22/14  
Time: 1730 hrs

**Location of Incident:** Groundwater Remediation Well PB53N2, north side of Building 53 at Eastman Business Park

**Name of Release Contact:** Burt Gorton

**Phone Number of Contact:** (585) 726-7291

<u>CAS Number</u>	<u>Material(s) Released</u>	<u>Quantity Released</u>
N/A	Contaminated Groundwater (see hazardous waste codes below)	~2-5 gallons
<u>Duration of Release</u>	<u>Physical State Released</u>	<u>Source of Release</u>
Days	Solid	See below
Hours	X Liquid	
~10 Minutes	Gas	

<u>Organizations Notified, Yes/No:</u>	<u>Date and Time of Notification</u>
National Response Center	Y 10/23/14; 1210 hrs
NYS Department of Environmental Conservation	Y 10/23/14; 1220 hrs
Monroe County Department of Health	N
State Emergency Response Commission	N
Local Emergency Planning Committee	N
NYSDEC (Pradeep Jangbari – phone message)	Y 10/23/14; 1230 hrs

## Factors Contributing to the Release:

Equipment Failure	Training Deficiencies
X Operator Error	Unusual Weather Conditions
Faulty Process Design	X Other (See Summary)

## Media in Which Material Was Released:

Industrial Sewer	Storm Sewer
Water/Waterways	Sanitary Sewer
Atmosphere	X Other (See Summary)

## Corrective Action Taken:

Neutralization	Monitoring
Containment	X System Shutdown/Repaired
X Excavation of Contaminated Media	X Other (See Summary)

## Brief Description of Corrective Action Taken to Remediate Released Material:

On October 22, 2014 at 1730 hrs, during an excavation the discharge pipe from a groundwater remediation well to the on-site industrial sewer system was inadvertently struck and broken by the backhoe. This excavation was being performed to allow a fire main system to be severed and capped to a building that will eventually be demolished. Although the pump well system was immediately shutdown, approximately 2-5 gallons of contaminated groundwater was leaked to the soil. The excavated soil was piled on the pavement beside the hole. On October 23, 2014, the pipe from the groundwater well to the industrial sewer was repaired. Based upon groundwater well monitoring results from May 9, 2013, Kodak estimates that the total amount of contamination from this release to be 0.43 milligrams (see details below). After field testing on the dirt pile with an OVA showed nothing was detected above ambient air background levels, Kodak used the soil to backfill the hole.

As follow-up to this incident, for any future such excavations to sever utilities services this building, Kodak has reviewed with the Contractor the location of, and has clearly field marked, any other underground pump well conveyance piping to the industrial sewer.

Kodak does not plan on taking any other actions.

Based upon monitoring results from 5/9/2013, the contaminated groundwater contains the following constituents:

Constituent	Concentration (mg/L)	Estimated Mass Released (in $\leq$ 5-gal) <b>(Milligrams)</b>
1,2-dichloropropane	0.0019	$\leq 0.04$
Cyclohexane	0.0093	$\leq 0.18$
Methylene chloride	0.011	$\leq 0.21$
Total		$\leq 0.43$

EPA Hazardous Waste Codes associated with the groundwater:

F001	F002	F003	F004	F005	F039					
U002	U003	U019	U028	U031	U037	U043	U044	U052	U056	U070
U076	U077	U078	U080	U083	U101	U108	U117	U140	U154	U159
U161	U165	U196	U210	U213	U220	U226	U228	U239		



DEC 24 2 00 PM '84  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

December 18, 1984

U.S. Environmental Protection Agency  
Region II  
Permits Administration Branch  
Room 432  
26 Federal Plaza  
New York, New York 10278

Attn: Mr. David Abrines

Dear Mr. Abrines:

Enclosed is a Notification of Hazardous Waste Activity for a facility which is a small generator but requires an EPA Identification Number to meet future RCRA requirements for manifesting waste and to simplify transport of waste under New York State regulations.

It would be appreciated if you could telephone the EPA ID Number to us when it is assigned with a subsequent written confirmation.

Very truly yours,

A handwritten signature in blue ink that reads 'Bruce H. Klanderma'.

Bruce H. Klanderma, PhD, Director  
Environmental Technical Services  
Health and Environment Laboratories

BHK;RHF:bwd

Enc.

cc: D. Cushman  
R. Liming  
B. Wirsig  
File 8.1







I.D. - FOR OFFICIAL USE ONLY														
S														
W														
1	2											13	14	15

**IX. DESCRIPTION OF HAZARDOUS WASTES** (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 2 23 - 26	2 F 0 0 3 23 - 26	3 F 0 0 5 23 - 26	4 X 0 0 2 * 23 - 26	5  23 - 26	6  23 - 26
7  23 - 26	8  23 - 26	9  23 - 26	10  23 - 26	11  23 - 26	12  23 - 26

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13  23 - 26	14  23 - 26	15  23 - 26	16  23 - 26	17  23 - 26	18  23 - 26
19  23 - 26	20  23 - 26	21  23 - 26	22  23 - 26	23  23 - 26	24  23 - 26
25  23 - 26	26  23 - 26	27  23 - 26	28  23 - 26	29  23 - 26	30  23 - 26

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 2 2 0 23 - 26	32 U 2 3 9 23 - 26	33  23 - 26	34  23 - 26	35  23 - 26	36  23 - 26
37  23 - 26	38  23 - 26	39  23 - 26	40  23 - 26	41  23 - 26	42  23 - 26
43  23 - 26	44  23 - 26	45  23 - 26	46  23 - 26	47  23 - 26	48  23 - 26

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49  23 - 26	50  23 - 26	51  23 - 26	52  23 - 26	53  23 - 26	54  23 - 26
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**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE (D001)     
 ☒ 2. CORROSIVE (D002)     
 ☐ 3. REACTIVE (D003)     
 ☒ 4. TOXIC (D000)

**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

<b>SIGNATURE</b> Bruce H. Klanderman	<b>NAME &amp; OFFICIAL TITLE (type or print)</b> Dr. Bruce H. Klanderman, Director Environmental Technical Services	<b>DATE SIGNED</b> 12/18/84
---	---	--------------------------------

EPA Form 8700-12 (6-80) REVERSE

\*Note - This code (X002) is the EPA waste code given in the instructions for PCB wastes are not regulated under RCRA. New York State DEC waste codes for PBB wastes include B001 through B011.



NYD980784680  
change mailing address  
4/29/85  
CP



March 5, 1985

U.S. Environmental Protection Agency  
Region II  
Permits Administration Branch  
Room 432  
26 Federal Plaza  
New York, New York 10278

Attn: Mr. David Abrines

Gentlemen:

Enclosed are Notification of Hazardous Waste Activity forms for several Eastman Kodak Facilities. These facilities require an EPA identification number to meet future RCRA requirements and to simplify the transportation of waste under New York State regulations.

Also, please correct the Acknowledgement of Notification of Hazardous Waste Activity for Kodak Office (EPA ID# NYD980784680) to reflect the installation mailing address as shown on the attached copy.

Very truly yours,

A handwritten signature in blue ink that reads 'Bruce H. Klanderman'.

Bruce H. Klanderman, Director  
Environmental Technical Services  
Health and Environment Laboratories

BHK/DAC:bwd1303A  
Encs.

cc: R. Bastian  
D. Cushman  
File 8.1



## ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•NY0980784530

K  
KODAK OFFICE

~~343 STATE STREET~~ ENVIR. TECH. SERV., FL 5, B-23  
ROCHESTER NY 14650

INSTALLATION ADDRESS

343 STATE STREET  
ROCHESTER

NY 14650



ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
NEW YORK, N.Y.

*Bastian*

1987 AUG -6 PM 3:39

PERMITS ADMINISTRATION  
BRANCH

July 29, 1987

Mr. Christopher J. Daggett  
Regional Administrator, Region II  
United States Environmental Protection Agency  
26 Federal Plaza, Room 1009  
New York, New York 10007

*NYD 980784680*

Attention: Ms. Lori Lawrence

Dear Ms. Lawrence:

Subject: Quarterly Report of Additional Noncompliance,  
Second Quarter, 1987

Module I, Condition D(18) of our RCRA Permit requires a quarterly report of additional noncompliances not reported under Condition D(15). Attached is a report for the second quarter of 1987.

If any further information is required, please contact Ron Bastian at (716) 722-4729.

Very truly yours,

*Haines B. Lockhart, Jr.*

Haines B. Lockhart, Jr., Director  
Environmental Technical Services  
Health & Environment Laboratories

HBL:ejb  
KJChurchill

Attachment

cc: Mr. Frank Shattuck  
NYSDEC, Region 8

Mr. Paul Counterman  
NYSDEC

ENVIRONMENTAL PROTECTION  
AGENCY, NEW YORK, N.Y.

1987 AUG -5 AM 11:04

CORRESPONDENCE CONTROL  
RECEIVED



Second Quarter 1987

				Material		Recovered Material		
Incident Date	Time	HWMU	Name	Quantity (Gal)	Injuries	Method of Disposition	Quantity (Gal)	Type of Incident
04/16/87	6:40 a.m.	02	Bulk solvent waste. EPA Code F003, F005.	2	None	To Kodak Park Wastewater Treatment Facility.	2	Spill
05/18-24/87		07	Cadmium	During the week of May 18-24, 1987, cadmium was detected in the scrubber water discharge from B-218, HWMU 07. A review of the known cadmium sources has been made and we believe that the source of the cadmium may have been drums of cadmium containing waste from an obsolete recovery operation. Appropriate disposal/treatment methods have been reinforced with the waste generating departments.				Improper Waste Management

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Haines B. Lockhart  
 Dr. H. B. Lockhart, Jr., Director  
 Environmental Technical Services  
 Health and Environment Laboratories



ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
1988 AUG 23 AM 11:26  
PERMITS ADMINISTRATION  
BRANCH

*Bauer*  
*Franklin*

July 27, 1988

NYD 980784680

Mr. Christopher J. Daggett  
Regional Administrator, Region II  
United States Environmental Protection Agency  
26 Federal Plaza, Room 1009  
New York, New York 10007

Attention: Ms. Lori Lawrence

Subject: Quarterly Report of Additional Noncompliance,  
Second Quarter, 1988

Module I, Condition D(18) of our RCRA Permit requires a quarterly report of additional noncompliances not reported under Condition D(15). Attached is a report for the first quarter of 1988 showing incidents of noncompliance.

If any further information is required, please contact Paul Lytle at (716) 722-4730.

Very truly yours,

Bruce H. Klanderman, Ph.D, Director  
Environmental Technical Services  
Health & Environment Laboratories

BHK:ejb  
DFranklin

Attachment

cc: Mr. Frank Shattuck  
NYSDEC, Region 8

Mr. Paul Counterman  
NYSDEC

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
NEW YORK, N.Y.  
1988 AUG -1 AM 10:14  
CORRESPONDENCE CONTROL  
BRANCH

First Quarter 1988

Incident Date	Time	HWMU	Name	Quantity (Gal)	Injuries	Method of Disposition	Quantity (gal)	Type of Incident
1/28/88	17:10	03	Mixed Solvents	25	None	To Kodak Park Wastewater Treatment Facility	20	Spill
1/17/88	8:20	08	Mixed Solvents	0.5	None	Material absorbed Sent to HWMU 07 for Treatment	0.5	Spill
1/14/88	9:00	02	Mixed Solvents	5	None	To Kodak Park Wastewater Treatment Facility	5	Spill

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

*Bruce H. Klanderman*

Bruce H. Klanderman, Ph.D, Director  
Environmental Technical Services  
Health and Environment Laboratories

Eastman Kodak Co - Rochester NY



File

ENVIRONMENTAL PROTECTION  
AGENCY, REGION 11  
NEW YORK, N.Y.

SEP 22 PM 1:53

PERMITS ADMINISTRATION  
DIVISION

NYD980 784680

September 6, 1988

Mr. Albert W. Butkas  
Kodak Project Manager  
New York State Department of  
Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

Dear Mr. Butkas:

Subject: Submittal Dates for Quality Assurance Project Plans (QAPP)  
and Reports

This is in response to your September 1, 1988 letter requesting an updated schedule of dates for QAPP's and reports. The following list includes planned dates for the reports specified in your letter as well as the additional reports listed herein.

<u>Title</u>	<u>Submittal Date</u>
* Study Area #1 Subsurface Utility Technical Memo	September 2, 1988
* Hydrogeologic Investigation and Aquifer Test Report	September 8, 1988
✓ * AWARE QAPP: Hydrogeologic & Engineering Services, KPW Distilling Area	September 8, 1988
* Woodward-Clyde Basement Integrity Survey* Technical Report	September 15, 1988
* KPW Monitoring Well Evaluation Study	September 23, 1988
* Lot 50 Surface Geophysical Method Evaluation Study	September 23, 1988
* H&A QAPP: Hydrogeologic Investigation, Kodak Park West	October 14, 1988

*not yet received*

*Chris commented on this*

Sincerely,

*Richard A. Poduska*

Richard A. Poduska, Ph.D.  
Health and Environment Laboratories

RAP:dar/0164E

cc: Study Area #1 Report Submission Distribution  
Kodak Park Internal Distribution



September 6, 1988

Mr. Albert W. Butkas  
Kodak Project Manager  
New York State Department of  
Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

Dear Mr. Butkas:

Subject: Woodward-Clyde Basement Integrity Survey

This letter is to follow up on my conversation with Tom Marriott at Kodak Park on Friday September 2, 1988 regarding additional basement integrity surveys. We have completed arrangements with Woodward-Clyde consultants to conduct additional basement integrity surveys in the Rand Street and Steko Avenue area on September 7 and 8, 1988. It has been possible to schedule at least 10 additional residences to be surveyed as a result of follow-up contacts with residents. The schedule for these surveys will be forwarded to you prior to initiation of the surveys.

The technical report on the basement integrity survey from Woodward-Clyde will include the information obtained from these, as well as, all the previous surveys. The technical report is scheduled to be submitted on September 15, 1988.

Sincerely,

Richard A. Poduska, Ph.D.  
Health and Environment Laboratories

RAP:dar/0163E

cc: Study Area #1 Report Submission Distribution  
Kodak Park Internal Distribution





September 7, 1988

Mr. Albert W. Butkas  
Kodak Project Manager  
New York State Department of  
Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

Dear Mr. Butkas:

Subject: Woodward-Clyde Basement Integrity Survey

Attached is the schedule for completing the basement integrity surveys for the Rand Street and Steko Avenue area referenced in my letter of September 6, 1988.

Sincerely,

A handwritten signature in cursive script that reads 'Richard A. Poduska'.

Richard A. Poduska, Ph.D.  
Health and Environment Laboratories

RAP:dar/0166E

cc: Study Area #1 Report Submission Distribution  
Kodak Park Internal Distribution

Survey Team:

Linda Sternberg - Industrial Hygienist

Steve Putrich - Engineer

Hygienist

88C 4155-C

P.2/2

	9:00-10:00	10:15-11:15	11:30-12:30	Lunch 12:30-1:30	2:00-3:00	3:15-4:15	4:30-5:30	Dinner 5:30-6:30	6:45-7:45	8:00-9:00
Wed 9/7	Reeves 106 Rand 647-3942 * can only stay for about 1/2 hour	Stein 263 Steko 254-0654		/			Beal 150 Rand 458-8658	/	Pawlaczyk 334 Rand 426-0019	Ging 109 Rand 254-8122
Thur 9/8			Stuart 160 Rand 254-0167	/			5:00 Pat McManus 181 Rand 232-7272 (work)	/	Konieczny 61 Rand 647-3756	Otto 117 Rand 458-2389

\* 274 Rand is owned by Kodak and can be surveyed at any available time

96 Rand Darleth 254-0568 - left message on ans. mach.

118 Rand Sample 254-0410 - left message on ans. mach.

262 Rand Dee, Juan - unlisted

295 Rand Ford, Tom 647-4154 left message on ans. mach.

138 Steko Ciulla unlisted

186 Steko Stehlik, Timothy 254-6637 - left message on ans. mach.

38 Rand Baker, Eugene unlisted

106 Rand Larry Reeves 647-3942 V

123 Rand Brooks 647-3396 - no ans

214 Rand Huff, Susan 647-9408 726-76 (work)

241 Rand Keenan 254-5863 - no ans

287 Rand unknown

306 Rand unknown

82 Steko James, Graham unlisted

90 Steko Sturtevant disconnected

132 Steko Smith, Donald 477-6518 no ans

160 Steko unknown

202 Steko Forbes, Albert unlisted

221 Steko ... .. unlisted

SEP 06 '88 11:42 WOODWARD-CLYDE NJ.201 785 0023



September 7, 1988

Mr. Albert W. Butkas  
Kodak Project Manager  
New York State Department of  
Environmental Conservation, Region 8  
6274 East Avon-Lima Road  
Avon, NY 14414

Dear Mr. Butkas:

Subject: Radian Quality Assurance Project Plan (QAPP)

As we discussed by telephone, this is responsive to your letter of September 2, 1988 regarding the Radian QAPP that was submitted for review on August 19.

We are eager to proceed with testing and can accept most of the modifications and conditions proposed as they generally involve minimal changes in tables or text. However, a few of the proposed modifications would require substantive changes to the QAPP. These changes go beyond what had been discussed and agreed to between Kodak and agency personnel during the meetings in Albany on July 21, 22, and 28, and those included in your August 3 letter. These meetings were held for the specific purpose of resolving such health-related matters.

The following items are of special note and need additional clarification:

Item 1: Procedures for modification of the Approved Work Plans for the remedial investigations are set forth in the Order on Consent [Section VI] between DEC and Kodak.

Items 12 & 32: The proposed modification would require the use of a protocol for soil gas testing different from the one previously approved by DEC, NYSDOH, MCDOH, and the Technical Team. Accurate and defensible results were obtained using the LOQ protocol at Hoover Drive School and Schools 5, 41 and 44. Soil gas test results less than LOQ have insufficient scientific confidence levels to determine if a chemical showing a minimal analytical response is indeed actually present.

Mr. Albert W. Butkas --2  
September 7, 1988

Items 8 & 16: These items would require deletion of the reference to the CSOAP surface sewer lateral in Lot 50. At the July 28 meeting DEC stated that Kodak's acceptance of the proposed intensive grid spacing would satisfy DEC's testing needs for the health-related, environmental and surface sewer construction programs. If this reference is to be deleted, we request a separate letter from DEC to confirm this commitment.

Items 9 & 33: The protocol provided in the QAPP will adequately determine the presence of volatile and semi-volatile chemicals present in groundwater samples. Table 4-4 includes the HSL volatile and semi-volatile organics as well as the volatile and semi-volatile chemicals detected in KPW groundwater. Unidentified peaks, if found in samples, will be identified and quantified to the extent possible. The information provided in the QAPP was discussed with DEC and DOH personnel at the July 28 meeting and agreed to as being satisfactory. The modification requested by DEC would involve at least several months delay in the analysis of groundwater samples. The approach presented in the QAPP achieves the needs of the health-related studies.

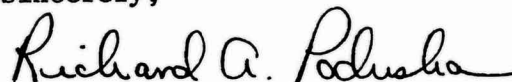
Item 19: At the Albany discussions, Kodak agreed with and accepted the NYSDOH proposal for a single ambient control area. A second control area would add both time and expense without adding commensurate scientific value.

Item 14: This item is subject to misinterpretation. No party's right to freedom of expression should be limited. Reporting should follow the procedures developed in the Albany discussions as stated on page 55, Section 4.

Mr. Albert W. Butkas --3  
September 7, 1988

We look forward to meeting with the appropriate agency personnel at the earliest opportunity. In the meantime, we will continue to move forward with the testing program assuming that you will agree to the prompt resolution of these and the other concerns pertinent to the QAPP. A letter from you approving this approach would be appreciated.

Sincerely,



Richard A. Poduska, Ph.D.  
Health and Environment Laboratories

RAP:dar/0165E

cc: Study Area #1 Report Submission Distribution  
Kodak Park Internal Distribution



NYD 980784680

#0001



ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
NEW YORK, N.Y.

1988 NOV 18 PM 12:23

PERMITS ADMINISTRATION  
BRANCH

November 10, 1988

RECEIVED  
NOV 16 1988

Mr. Christopher J. Daggett  
Regional Administrator, Region II  
United States Environmental Protection Agency  
26 Federal Plaza, Room 1009  
New York, New York 10007

Attention: Ms. Lori Lawrence

Dear Mr. Daggett:

Subject: Report of Additional Noncompliance

Module I, Condition D(19) of our RCRA Permit requires a report of additional noncompliances not reported under Condition D(15) and D(18). Attached is a report showing those items of noncompliance discovered after, and, therefore, not previously reported in quarterly reports.

If any further information is required, please contact Burt Gorton of my office at (716) 722-6943.

Very truly yours,

*Bruce H. Klanderman*

Bruce H. Klanderman, Ph.D., Director  
Environmental Technical Services  
Health & Environment Laboratories

BHK-BGG:daf

Attachment

cc: Mr. Frank Shattuck  
NYSDEC, Region 8

Mr. Paul Counterman  
NYSDEC

ENVIRONMENTAL PROTECTION  
AGENCY, REGION II  
88 NOV 15 PM 4:30  
AIR & WASTE MANAGEMENT  
DIVISION

REPORT OF NONCOMPLIANCE

November 10, 1988


<u>ITEM NO.</u>	<u>HWMU NO.</u>	<u>ITEM DESCRIPTION</u>
1.	17	Storage of on-site generated Lead acetate (EPA Code- U144) in excess of 90 days, 9/9/86 to present.
2.	17	Acceptance of EPA Code D009, a Lab Pack, from off-site Kodak facility on 6/23/86 (presently stored at facility).
3.	17	Storage of on-site generated Arsenic trioxide (EPA CODE- P012) in excess of 90 days, 1/1/88 to present.
4.	07	Exceedance of 9% ash content in blended waste stream sample collected on 12/18/87.
5.	07	Exceedance of 2% ash content in blended waste stream sample collected on 1/16/88.
6.	07	Exceedance of 2.2% ash content in blended waste stream sample collected on 2/13/88.
7.	07	Exceedance of 1.2% ash content in blended waste stream sample collected on 5/7/88.

REMEDIAL ACTION

For Items #1-3, HWMU #17, we are making arrangements to send the material off-site to an appropriate TSD facility for disposal. The Environmental Technical Services Section, Health and Environment Laboratories, is working with the Investment Recovery Department, Materials Management Division, to expedite this matter as quickly as possible.

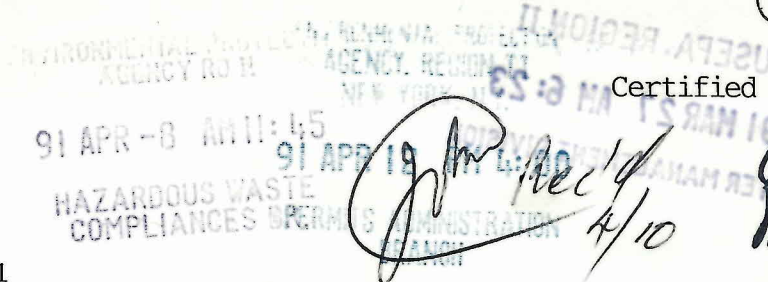
For Items #4-7, HWMU #07, we have received commitment from our Analytical Services Division to dedicate analytical equipment and personnel, from outside contract laboratories if necessary, to decrease the time between sample collection and notification of analytical results to HWMU #07.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
Bruce H. Klander, Ph.D., Director  
Environmental Technical Services  
Health and Environment Laboratories

BHK-BGG:daf

1029H



March 18, 1991

Mr. Constantine Sidamon-Eristoff  
Regional Administrator  
United States Environmental Protection Agency  
Region II  
Jacob K. Javits Federal Building  
New York, New York 10278

NY 8 980 784650

Re: EPA Request for Information Under 42 U.S.C. Sections 6927  
and 9604 and Response to March 6, 1991 Letter from  
Mr. Constantine Sidamon-Eristoff to Mr. Kay R. Whitmore

Dear Mr. Sidamon-Eristoff:

In response to your March 6, 1991 letter to Mr. Kay R. Whitmore, the following is provided to clarify the situation.

Dr. R. Hays Bell's February 22, 1991 letter to Mr. Constantine Sidamon-Eristoff incorrectly indicated that a response to Mr. Richard Caspe's December 19, 1990 letter was enclosed. In fact, the response to Mr. Richard Caspe's December 19, 1990 letter was mailed on March 7, 1991 by Mr. Alan Floro to Mr. Meyer with a copy also sent to Mr. Terrence Sullivan.

Please contact me at (716) 722-0248 if you have any questions.

Sincerely,

*Bruce H. Klanderman*

Bruce H. Klanderman, Ph.D., Director  
Environmental Technical Services  
Health & Environment Laboratories

BHK:ejb  
PELytle  
1492H

cc: R. Hays Bell  
Kay R. Whitmore

DIRECTOR'S OFFICE  
1991 APR - 1 PM 2:46  
REMEDIAL RESPONSE  
OFFICE OF EMERGENCY &  
EPA-REGION II



Copy to Maria Lee  
original to PAB

Sumai Bellina

91 JUN 31 PM 3:12  
OR

June 25, 1991

Mr. Constantine Sidamon-Eristoff  
Regional Administrator  
United States Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, NY 10278

NYD980784680

Dear Mr. Sidamon-Eristoff:

Subject: Authorized Signatures  
Storage Tank Improvement Program

This letter is to notify you that Terrence E. Lee is hereby authorized to sign letters on my behalf concerning the Kodak Park Storage Tank Improvement Program. Would you please copy Mr. Lee on all correspondence to me.

Mr. Terrence E. Lee  
Environmental Technical Services  
Health and Environment Laboratories  
1100 Ridgeway Avenue  
Rochester, New York 14652-3615  
FAX: 716-722-3695; Office Phone: 716-477-8184

Sincerely,

Bruce H. Klanderman

Bruce H. Klanderman, Director  
Environmental Technical Services  
Health and Environment Laboratories

BHK/PLUSRRB107

cc: Mr. Paul R. Counterman, P.E. NYSDEC

REGION II  
ENVIRONMENTAL PROTECTION  
JUN 27 1991  
POLICE CONTROL



SP: dj

bcc: W. Colden/D. Lucia/S. Ports/File

D. David, Reg. 8

doc name: kodak01.wpd

John P. Cahill  
Acting Commissioner

JUN 24 1997

Mr. Peter Muehlbauer  
Eastman Kodak Company  
Kodak Office  
343 State Street  
Rochester, NY 14650

Dear Mr. Muehlbauer:

RE: Hazardous Waste Reduction Plan (HWRP)  
Biennial Update (BU) and Annual Status Report (ASR)  
Eastman Kodak Company - Kodak Office  
EPA ID # NYD 980 784 680

The Department has reviewed your Hazardous Waste Reduction Plan BU and ASR submitted for the above referenced facility on June 28, 1996 and June 16, 1997, respectively. Based on that review, it has been determined that the reports meet the requirements of Article 27, Section 0908 of the Environmental Conservation Law.

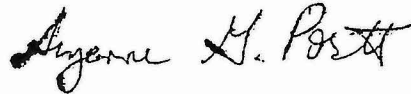
In addition, Article 27, Section 0908 of the Environmental Conservation Law requires that you submit a HWRP if your facility generates over 25 tons of hazardous waste in 1995 or any year thereafter. Based on your 1996 Annual Generator Report, your facility generates less than 25 tons of hazardous waste subject to these reporting requirements. Therefore, you are not required at this time to submit Annual Status Reports or Biennial Updates for your facility. However, should your waste generation exceed 25 tons in the future, as indicated by your Annual Generator Report, you will be required to submit a report.

Although you are not currently subject to submit your plans to the Department for review and acceptance, under State law all generators that manifest hazardous wastes are required to have in place a program to reduce the volume or quantity and toxicity of such waste. We encourage you to continue to achieve additional waste reductions by improved house keeping, monitoring, record keeping and implementing those technically feasible and economically viable measures that will result in maximum waste reduction.



If you have any questions, please call me at 518-457-6072.

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne G. Ports". The signature is written in a cursive style with a large, stylized "S" and "P".

Suzanne G. Ports, P.E.  
Environmental Engineer  
Hazardous Waste Minimization Section

cc: J. Reidy, EPA Reg. II

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
HAZARDOUS WASTE REDUCTION PLAN/BIENNIAL UPDATE  
FACILITY SUMMARY SHEET

DATE: 6/16/97

EPA ID #	NYD980784680
COMPANY NAME	Eastman Kodak Company - Kodak Office
ADDRESS	343 State Street
CITY	Rochester
STATE	NY
ZIP CODE	14650
FACILITY CONTACT	Peter Muehlbauer
PHONE #	716-726-5906
SIC CODE	2752
REGION (NYS)	8
FINAL HSWA PERMIT EFFECTIVE DATE	NA
FINAL NYS PART 373 PERMIT EFFECTIVE DATE	NA

DESCRIPTION OF ORIGINAL PROCESS:

Photographic development.

DESCRIPTION OF WASTE REDUCTION ACTIVITY:

Photographic spent solutions are sent off site for recovery.

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
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		TABLE 1										
EASTMAN KODAK COMPANY--KODAK OFFICE				HAZARDOUS WASTE GENERATION/TREATMENT								
				EPA ID NO. NYD980784680								
WASTE STREAM ID NUMBER	GENERAL DESCRIPTION OF CONSTITUENTS OF WASTE (IF APPLICABLE)	SOURCE OF GENERATION	TREATMENT OR DISPOSAL METHOD	QUANTITY OF WASTE GENERATED (TONS)			DESCRIPTION OF PRODUCTION INDEX	INDICES				
				1993	1994	1995		1993	1994	1995		
HW01-93	SPENT PHOTOGRAPHIC SOLUTIONS	CONSUMER AND PROFESSIONAL PHOTOGRAPHY PHOTOPROCESSING	OFF-SITE ELECTROLYTIC RECOVERY	21.2	17.8	17.5	AMOUNT OF FIXER USED IN REPORTING YEAR DIVIDED BY AMOUNT OF FIXER USED IN BASE YEAR	1	0.8	0.8		
HW03-93	WASTE MERCURY CONTAMINATED ARTICLES	NORMAL FACILITY MAINTENANCE ACTIVITIES	OFF-SITE STORAGE PRIOR TO LANDFILL	23.1	7.3	1.6	monitor database and manifest records to determine #'s reduced	1	NA	NA		

# APPENDIX 2

					TABLE 2			
	EASTMAN KODAK COMPANY--KODAK OFFICE		HAZARDOUS WASTE GENERATION/TREATMENT				EPA ID NO. NYD980784680	
			SUMMARY					
WASTE STREAM	GENERAL DESCRIPTION	PROCESS CATEGORY	REDUCTION		PROJECTED WASTE	METHOD USED TO	GOAL	
ID NUMBER	OF CONSTITUENTS OF WASTE		PLANS/PROJECTS		REDUCTION	CALCULATE	DATE	
	(IF APPLICABLE)				(TONS)			
HW01-93	SPENT PHOTOGRAPHIC	CONSUMER AND	PRODUCTION PROCESSES, PROCEDURES, AND		MINIMAL DUE TO NATURE OF	NA	ONGOING	
	SOLUTIONS	PROFESSIONAL	EQUIPMENT ARE MODIFIED AS SPECIFIED BY		PROCESS REQUIREMENTS			
		PHOTOGRAPHIC PROCESSING	ONGOING RESEARCH/DEVELOPMENT RESULTS					
HW03-93	WASTE MERCURY	NORMAL FACILITY MAINTENANCE	NONE IDENTIFIED		MINIMAL DUE TO NORMAL	NA	NA	
	CONTAMINATED ARTICLES	ACTIVITIES			MAINTENANCE ACTIVITY ONLY			

SP.dj

bcc: W. Colden/D. Lucia/S. Ports/File

D. David, Reg. 8

doc name: kodak01.wpd

518-457-6072 FAX 518-457-1283

John P. Cahill  
Acting Commissioner

Mr. Peter Muehlbauer  
Eastman Kodak Company  
Kodak Office  
343 State Street  
Rochester, NY 14650

JUL 01 1997

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Eastman Kodak Company - Kodak Office  
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Environmental Engineer  
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cc: J. Reidy, EPA Reg. II